

FILED
Clerk
District Court

JUL 07 2005

For The Northern Mariana Islands
By J
(Deputy Clerk)

UNITED STATES DISTRICT COURT
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,
Plaintiff,

v.

DAI Xiao Jun,

Defendant.

Criminal Case No. **CR 05 00022**

INDICTMENT

COUNT 1
Trafficking in Counterfeit Goods
18 U.S.C. § 2320

COUNT 2
Possession of a Controlled Substance With
Intent to Distribute
21 U.S.C. §§841(a)(1) & 841(b)(1)(D)

THE GRAND JURY CHARGES:

COUNT 1

Trafficking in Counterfeit Goods

On or about June 29, 2005, in the District of the Northern Mariana Islands, the defendant, DAI Xiao Jun knowingly, intentionally and unlawfully trafficked and attempted to traffic in counterfeit goods. That is, the defendant transported, transferred, and caused to be transported and transferred, approximately 4000 counterfeit tablets of the prescription drug, Viagra, bearing counterfeit manufacturer's markings.

This is a violation of Title 18, United States Code, Section 2320.

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1 THE GRAND JURY FURTHER CHARGES:
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3 COUNT 2

4 Possession of a Controlled Substance With Intent to Distribute

5 On or about June 29, 2005, in the District of the Northern Mariana Islands, the defendant, DAI
6 Xiao Jun, did knowingly and intentionally possess with intent to distribute approximately 4 pounds of
7 Marijuana, a Schedule I controlled substance.

8 This is a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).
9

10 Dated this 7th day of July, 2005
11

12 A TRUE BILL.

13 
14 Foreperson

15 LEONARDO M. RAPADAS
16 United States Attorney
17 Districts of Guam and NMI

18 By: 
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20 JAMIE D. BOWERS
21 Assistant United States Attorney
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